

EXHIBIT 1



Transcript of the Deposition of

Cutberto Viramontes

Case: Cutberto

Viramontes; et al. v. The County of Cook; et al.

Taken On: February 9, 2022

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CUTBERTO VIRAMONTES, et al.,)
)
)
Plaintiffs,)
)
)
-vs-) No. 1:21-CV-04595
)
)
THE COUNTY OF COOK, et al.,)
)
)
Defendants.)

The deposition of CUTBERTO VIRAMONTES,
taken pursuant to notice and the Federal Rules of
Civil procedure for the United States District Courts,
reported by Sally Durkin, Certified Shorthand Reporter
and Notary Public within and for the County of Cook,
State of Illinois, via videoconference from Chicago,
Illinois, on Wednesday, February 9, 2022, at the hour
of 9:30 o'clock a.m.

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1 APPEARANCES VIA VIDEOCONFERENCE:

2

3 COOPER & KIRK, PLLC
4 BY: MR. WILLIAM V. BERGSTROM and
MR. PETE PATTERSON
1523 New Hampshire Avenue, N.W.
5 Washington, D.C. 20036
(202) 220-9600
6 wbergstrom@cooperkirk.com
ppatterson@cooperkirk.com

7

8 On behalf of the Plaintiffs;

9

10 COOK COUNTY STATE'S ATTORNEY'S OFFICE -
COMPLEX LITIGATION SECTION
11 BY: MR. DAVID A. ADELMAN and
MS. HELLIN JANG
500 Richard J. Daley Center
12 Chicago, Illinois 60602
(312) 603-5440
13 david.adelman@cookcountyil.gov
hellin.jang@cookcountyil.gov

14

15 On behalf of the Defendants.

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CUTBERTO VIRAMONTES

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Examination By Mr. Adelman

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EXHIBITS

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Exhibit No. 1

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<p style="text-align: center;">Page 4</p> <p>1 THE REPORTER: Before we proceed, I'll ask counsel 2 to agree on the record that under the current national 3 emergency pursuant to Section 319 of the Public Health 4 Service Act, there is no objection to this deposition 5 officer administering a binding oath to the witness 6 remotely.</p> <p>7 Please state your agreement on the 8 record.</p> <p>9 MR. ADELMAN: This is David Adelman on behalf of 10 the defendants. We agree.</p> <p>11 MR. BERGSTROM: This is Will Bergstrom on behalf 12 of plaintiffs. We agree.</p> <p>13 (Witness sworn.)</p> <p>14 MR. ADELMAN: All right. Good morning, 15 Mr. Viramontes.</p> <p>16 How are you?</p> <p>17 THE WITNESS: Good morning.</p> <p>18 MR. ADELMAN: You were a little frozen there for a 19 minute.</p> <p>20 THE WITNESS: Yeah. I am sorry. I'm using Wi-Fi.</p> <p>21 MR. ADELMAN: Okay. This deposition is of 22 Cutberto Viramontes, one of the plaintiffs in the 23 Viramontes, et al versus County of Cook, et al, 24 21-cv-04595, pending in the United States District</p>	<p style="text-align: center;">Page 6</p> <p>1 MR. ADELMAN: And also if you need a break at any 2 time, just let me know. It's not a problem. 3 But if there is a question pending, you 4 have to finish answering the question first before we 5 go ahead and break. 6 Understand?</p> <p>7 THE WITNESS: Yes.</p> <p>8 CUTBERTO VIRAMONTES, 9 having been first duly sworn, was 10 examined and testified as follows:</p> <p style="text-align: center;">EXAMINATION</p> <p>12 BY MR. ADELMAN:</p> <p>13 Q. Okay. All right. Can you state your name for the record?</p> <p>15 A. Cutberto Viramontes.</p> <p>16 Q. Okay. And do you have a middle name?</p> <p>17 A. No.</p> <p>18 Q. Okay. And what is your date of birth?</p> <p>19 A. January 25, 1990.</p> <p>20 Q. And what is your address?</p> <p>21 A. [REDACTED], 22 Chicago, Illinois [REDACTED].</p> <p>23 Q. Is that a house or apartment?</p> <p>24 A. Apartment.</p>
<p style="text-align: center;">Page 5</p> <p>1 Court for the Northern District of Illinois before 2 District Court Judge and Chief Judge Rebecca 3 Pallmeyer.</p> <p>4 My name is David Adelman, and I'm 5 representing the defendants that you have sued.</p> <p>6 Mr. Viramontes, I will be asking you a 7 number of questions which you have to answer 8 truthfully since you are under oath.</p> <p>9 If you do not understand any questions, 10 you know, please let me know, and I'll be happy to 11 rephrase it. But if you -- but on the same token, if 12 you give an answer, then I'll assume you understood 13 it.</p> <p>14 Is that fair?</p> <p>15 THE WITNESS: I understand. Yes.</p> <p>16 MR. ADELMAN: Okay. And when you do make an 17 answer, please answer so we can hear you.</p> <p>18 The court reporter cannot take down a 19 shake of the head or --</p> <p>20 THE WITNESS: Okay.</p> <p>21 MR. ADELMAN: -- a shrug of the shoulder. It has 22 to be a yes or no or articulate the answer.</p> <p>23 Okay?</p> <p>24 THE WITNESS: Okay.</p>	<p style="text-align: center;">Page 7</p> <p>1 Q. All right. Have you ever been known by any other name?</p> <p>3 A. No. Well, Bert is a nickname I have at work. 4 Short for Cutberto.</p> <p>5 Q. How do you spell that?</p> <p>6 A. B-E-R-T.</p> <p>7 Q. Okay. So why do you have that nickname at work?</p> <p>9 A. Because it's short for Cutberto. My name is 10 long and hard to pronounce for some.</p> <p>11 Q. I see. And do you live with anyone?</p> <p>12 A. Yes. My brother. My sibling and my mother.</p> <p>13 Q. And what is your brother's name?</p> <p>14 A. Alfredo Arroyo.</p> <p>15 Q. And what is your mother's name?</p> <p>16 A. I am sorry. Did you ask --</p> <p>17 Q. What's your mother's name?</p> <p>18 A. Rosa Maria Viramontes.</p> <p>19 Q. Let's see. How long have you lived there?</p> <p>20 A. Maybe three years.</p> <p>21 Q. Okay. So it would be in 2019 you moved there?</p> <p>23 A. That sounds right.</p> <p>24 Q. Okay. Where did you live before then?</p>

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<p>1 A. I lived in -- not much further. Maybe like 2 10 minutes east over in McKinley Park.</p> <p>3 Q. How long did you live there?</p> <p>4 A. Maybe five years.</p> <p>5 Q. What's the address, do you remember?</p> <p>6 A. [REDACTED], I believe.</p> <p>7 Q. Okay. And you said that the place you were 8 living now at [REDACTED] is an apartment 9 building, correct?</p> <p>10 A. [REDACTED]. It's an apartment.</p> <p>11 Q. How many apartments are in that building?</p> <p>12 A. It's two. Just a top and a bottom floor.</p> <p>13 Q. Okay. So how are you feeling today?</p> <p>14 A. I'm feeling well, good.</p> <p>15 Q. Do you have any conditions that would impair 16 your memory?</p> <p>17 A. No.</p> <p>18 Q. Okay. So are you able to testify accurately 19 today?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Are you taking any medication that 22 would interfere with your memory?</p> <p>23 A. No.</p> <p>24 Q. Do you have any medical conditions that might</p>	<p>1 Did you review any documents to prepare for 2 this deposition?</p> <p>3 A. I pulled one document, the complaint. But 4 this was just a few minutes ago.</p> <p>5 Q. But you didn't review anything else for the 6 deposition?</p> <p>7 A. For the deposition other than this, no.</p> <p>8 Q. Okay. Okay. Did you speak with anyone else 9 about this deposition?</p> <p>10 A. My mother knows that I have this going on 11 here in my room, but that's it.</p> <p>12 Q. All right. Do you have the complaint before 13 you or with you right now?</p> <p>14 A. I have it here on the monitor on my desktop, 15 yes.</p> <p>16 MR. ADELMAN: Okay. Actually, Ms. Court Reporter, 17 you have it.</p> <p>18 Can you share your screen?</p> <p>19 So showing you what will be marked as 20 Exhibit No. 1.</p> <p>21 (Whereupon, Exhibit No. 1 22 was identified.)</p> <p>23 BY MR. ADELMAN:</p> <p>24 Q. Do you recognize what this document is?</p>
<p>1 interfere with your memory?</p> <p>2 A. No.</p> <p>3 Q. Okay. Now, did you prepare for this 4 deposition?</p> <p>5 A. I spoke with my attorneys before.</p> <p>6 Q. Okay. Now, I'm not asking what you talked 7 about. That's privileged, and I am not going to ask 8 you about that.</p> <p>9 But how many times did you meet with your 10 attorney?</p> <p>11 A. Most recently, just once.</p> <p>12 Q. You said most recently?</p> <p>13 A. Uh-huh.</p> <p>14 Q. How many times have you met?</p> <p>15 A. Well, we have had correspondence through 16 email.</p> <p>17 Q. Okay. And so before the deposition you only 18 met with your attorney once?</p> <p>19 A. Face-to-face, yes.</p> <p>20 Q. Okay. Was this at his office or by Zoom?</p> <p>21 A. Also through Zoom remotely, yes.</p> <p>22 Q. And did you review any documents?</p> <p>23 A. Not during the meeting.</p> <p>24 Q. Sorry. We're talking over each other.</p>	<p>1 A. Yes. The complaint.</p> <p>2 Q. What is it?</p> <p>3 A. The complaint.</p> <p>4 Q. Okay. Now, who prepared this complaint? Was 5 this prepared by your attorneys?</p> <p>6 A. Yes.</p> <p>7 MR. ADELMAN: Okay. Now, can you go to the last 8 page, Ms. Court Reporter?</p> <p>9 BY MR. ADELMAN:</p> <p>10 Q. So you did not sign this document, correct?</p> <p>11 A. I am sorry. One moment.</p> <p>12 Q. Okay. Did you sign the complaint before it 13 was filed?</p> <p>14 A. I did sign something. I don't think this is 15 the copy that I signed.</p> <p>16 Q. Okay. Did you read the complaint before it 17 was filed?</p> <p>18 A. I did.</p> <p>19 Q. Okay. And did you make sure it was accurate 20 before it was filed?</p> <p>21 A. I did.</p> <p>22 MR. ADELMAN: All right. Ms. Court Reporter, you 23 can take it down for now. We'll need it back up in a 24 little bit.</p>

5 (Pages 8 to 11)

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<p style="text-align: center;">Page 12</p> <p>1 BY MR. ADELMAN:</p> <p>2 Q. Okay. Do you know Rubi Joyal -- that's</p> <p>3 R-U-B-I. J-O-Y-A-L -- one of your co-plaintiffs?</p> <p>4 A. I've not met her personally, but I've read</p> <p>5 the individuals involved in this lawsuit.</p> <p>6 Q. Okay. So Rubi Joyal is a male or a female?</p> <p>7 A. As I said --</p> <p>8 Q. You kind of froze there.</p> <p>9 A. Oh, Rubi, I have never met her in person. So</p> <p>10 I don't know. These are people that I only know</p> <p>11 through the paperwork. I've never, like, interacted</p> <p>12 with them in person.</p> <p>13 Q. Okay. So you don't have any sort of</p> <p>14 relationship with Rubi whether friends or --</p> <p>15 A. Correct.</p> <p>16 Q. What about Christopher Khaya -- that's</p> <p>17 K-H-A-Y-A -- the other co-plaintiff?</p> <p>18 A. Same situation. No personal relationship.</p> <p>19 Q. Okay. Have you ever spoken with Christopher?</p> <p>20 Have you ever spoken with Christopher?</p> <p>21 A. No.</p> <p>22 Q. And have you ever spoken to Rubi?</p> <p>23 A. No.</p> <p>24 Q. Do you know what the Second Amendment</p>	<p style="text-align: center;">Page 14</p> <p>1 two years.</p> <p>2 Q. Okay. So why did you join both the Second</p> <p>3 Amendment Foundation and Firearms Policy Coalition?</p> <p>4 A. I wanted to join some groups that were very</p> <p>5 active in Chicago --</p> <p>6 Q. Sorry. You cut out.</p> <p>7 A. -- about second amendment rights.</p> <p>8 And I haven't been a big fan of the NRA. I</p> <p>9 don't like the way that they're run and they handle</p> <p>10 things.</p> <p>11 And these two organizations seemed to have</p> <p>12 played a big role in the McDonald case allowing us to</p> <p>13 have pistols here in Chicago, and that's why I decided</p> <p>14 to join them because I like their work for that.</p> <p>15 Q. So how did you find out about each of them?</p> <p>16 A. When I was looking for an alternative in</p> <p>17 supporting the Second Amendment Organization other</p> <p>18 than the NRA, I researched, and I came across these</p> <p>19 two.</p> <p>20 Q. So now this is a yes-or-no question.</p> <p>21 Was it your idea to file this lawsuit?</p> <p>22 A. No.</p> <p>23 Q. Okay. I guess that's a yes-or-no question.</p> <p>24 A. Uh-huh.</p>
<p style="text-align: center;">Page 13</p> <p>1 Foundation is?</p> <p>2 A. Yes.</p> <p>3 Q. And are you a member?</p> <p>4 A. I am.</p> <p>5 Q. And how long have you been a member?</p> <p>6 A. Maybe two years.</p> <p>7 Q. Okay. So what does membership entail for</p> <p>8 you?</p> <p>9 A. I am sorry. You got cut off there.</p> <p>10 Q. I asked, what does membership entail for you?</p> <p>11 A. All they do is I pay them dues, and they</p> <p>12 fight for our Second Amendment rights.</p> <p>13 Q. Okay. Do you have any involvement in the</p> <p>14 activities of the foundation?</p> <p>15 A. Outside of this, no.</p> <p>16 Q. And when you say this, you mean this lawsuit?</p> <p>17 A. They're involved, yes.</p> <p>18 Q. And do you know the Firearms Policy</p> <p>19 Coalition, Inc.?</p> <p>20 A. Yes.</p> <p>21 Q. Are you a member of that?</p> <p>22 A. Yes.</p> <p>23 Q. How long have you been a member?</p> <p>24 A. I joined about the same time. So also about</p>	<p style="text-align: center;">Page 15</p> <p>1 Q. Was filing this lawsuit, to your knowledge,</p> <p>2 an idea from the Second Amendment Foundation?</p> <p>3 MR. BERGSTROM: Objection. Form.</p> <p>4 BY MR. ADELMAN:</p> <p>5 Q. To the best of your knowledge?</p> <p>6 If you don't know, then say you don't know.</p> <p>7 A. Not that one in particular.</p> <p>8 Q. Okay. Was filing this lawsuit an idea of</p> <p>9 someone at the Firearms Policy Coalition?</p> <p>10 MR. BERGSTROM: Objection. Form.</p> <p>11 BY MR. ADELMAN:</p> <p>12 Q. You can answer.</p> <p>13 A. To my knowledge, it was the Firearms Policy</p> <p>14 Coalition.</p> <p>15 Q. Who at the Firearms Policy Coalition were you</p> <p>16 referring to?</p> <p>17 A. No individual in particular.</p> <p>18 THE REPORTER: The witness keeps buffering.</p> <p>19 MR. ADELMAN: Yeah. I was going to ask you,</p> <p>20 Ms. Court Reporter, if you got that.</p> <p>21 THE REPORTER: There has been a couple times where</p> <p>22 he keeps buffering.</p> <p>23 BY MR. ADELMAN:</p> <p>24 Q. Can you repeat that, Mr. Viramontes?</p>

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<p>1 A. I am sorry. What was the question again?</p> <p>2 MR. ADELMAN: Can you read it back?</p> <p>3 (The record was read as requested.)</p> <p>4 THE WITNESS: Okay. That is all I said, and no</p> <p>5 one in particular. I didn't say anything after that.</p> <p>6 BY MR. ADELMAN:</p> <p>7 Q. Okay. You had mentioned that you joined</p> <p>8 these organizations, or one of the reasons was because</p> <p>9 you did not like the policies of the National Rifle</p> <p>10 Association.</p> <p>11 Do you recall saying that?</p> <p>12 A. I just don't think they're very effective and</p> <p>13 well run.</p> <p>14 Q. Okay. So why do you say that?</p> <p>15 A. They have -- they give up a little bit too</p> <p>16 easy in terms of some of our rights. It seems like</p> <p>17 they've had a lot of issues with misuse of funds.</p> <p>18 Instead of using it towards legislation, they use it</p> <p>19 for their own personal use sometimes. It seems to be</p> <p>20 on the news a lot. So that's one of the reasons why I</p> <p>21 wanted a different --</p> <p>22 Q. What do you base that on?</p> <p>23 A. -- a different organization. The use of</p> <p>24 those funds for illegal, these are just things I have</p>	<p>1 A. I didn't really have a sense of direction,</p> <p>2 and it was very expensive, and I wasn't comfortable</p> <p>3 taking on that much debt for something I wasn't sure I</p> <p>4 was going to do.</p> <p>5 Q. Have you had any certification or training</p> <p>6 since then?</p> <p>7 A. I became a realtor for a little bit.</p> <p>8 Q. We'll get into that in a minute. All right.</p> <p>9 Let's talk about your employment.</p> <p>10 Are you currently employed?</p> <p>11 A. Yes.</p> <p>12 Q. Where do you work?</p> <p>13 A. Onward Technologies.</p> <p>14 Q. What is it called?</p> <p>15 A. Onward Technologies.</p> <p>16 Q. Okay. And when did you start there?</p> <p>17 A. Maybe four years ago.</p> <p>18 Q. So it would be what year?</p> <p>19 A. I think it was '17.</p> <p>20 Q. 2017?</p> <p>21 A. Sounds right, yes.</p> <p>22 Q. Okay. So what position do you have there?</p> <p>23 A. I'm the administrative assistant, office</p> <p>24 manager, I guess.</p>
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<p>1 read online.</p> <p>2 Q. Is there any policy of the NRA that you do</p> <p>3 not like?</p> <p>4 A. In particular the policies, not so much.</p> <p>5 It's just the misuse of funds that I have an issue</p> <p>6 with.</p> <p>7 Q. All right. Let's talk about your background</p> <p>8 a little bit.</p> <p>9 What is your highest level of education?</p> <p>10 A. Three years of college.</p> <p>11 Q. Okay. And where at?</p> <p>12 A. St. Xavier University.</p> <p>13 Q. Did you graduate?</p> <p>14 A. I did not.</p> <p>15 Q. Are you currently enrolled in college?</p> <p>16 A. No.</p> <p>17 Q. And when did you attend St. Xavier?</p> <p>18 A. Ten years ago.</p> <p>19 Q. So?</p> <p>20 A. So 2011-12. Around there.</p> <p>21 Q. What was your major?</p> <p>22 A. General biology.</p> <p>23 Q. Okay. So how come you stopped going to</p> <p>24 school?</p>	<p>1 Q. And what was your previous employer?</p> <p>2 A. At the time it was called Zugress Security.</p> <p>3 Q. How do you spell that?</p> <p>4 A. Z-U-G-R-E-S-S.</p> <p>5 Q. Where is that?</p> <p>6 Actually, going back to Onward, where is</p> <p>7 Onward located, what city?</p> <p>8 A. I am sorry. One more time. You cut off.</p> <p>9 Q. Where is Onward located?</p> <p>10 A. It's in Michigan Plaza in the loop.</p> <p>11 Q. Do you know the address?</p> <p>12 A. 233 North Michigan.</p> <p>13 Q. That's in Chicago?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And Zugress Security, where is that</p> <p>16 located?</p> <p>17 A. That was in the South Loop on Wells.</p> <p>18 Q. Do you know the address for that -- for</p> <p>19 Zugress?</p> <p>20 A. I do not remember. It's in the Cacciatore</p> <p>21 Building.</p> <p>22 Q. Can you spell that building? Do you know?</p> <p>23 A. I'm not sure. I can try to spell it.</p> <p>24 C-A-C-I-A-T-O-R-E. I'm not sure if that's correct.</p>

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<p style="text-align: center;">Page 20</p> <p>1 Q. So what did you do for Zugress? 2 A. I worked in the payroll department. 3 Q. So when did you start at Zugress, and when 4 did you leave? 5 A. Well, I was there for another five years. So 6 going back from starting in 2017 onward. So maybe 7 2002. Or '12, I mean. 8 Q. So you were there from 2012 to 2017? 9 A. Yes. And I switched to Onward. 10 Q. Okay. And during those five years, you were 11 always in the payroll department? 12 A. Yes. 13 Q. Okay. Now, did you work anywhere before 14 Zugress? 15 A. No. That was my first place. 16 Q. Okay. 17 A. My first job. 18 Q. Have you had any law enforcement training? 19 A. No. 20 Q. Have you ever been employed by law 21 enforcement? 22 A. No. 23 Q. Have you ever volunteered for any law 24 enforcement department or agency?</p>	<p style="text-align: center;">Page 22</p> <p>1 A. Several years. I would just be guessing. I 2 would say maybe six, seven years. 3 Q. So why did you get a FOID card? 4 A. Yes. 5 Q. No. Why did you get a FOID card? 6 A. Oh, because I wanted to own a firearm. 7 Q. Why did you own one? 8 A. Self-defense. 9 Q. Does anyone else in your household have a 10 FOID card? 11 A. Not that I know of. 12 Q. Did you have to go through any training in 13 order to get the FOID card? 14 A. I'm sorry. 15 Q. Did you have to go through any firearms 16 training in order -- or any other sort of training to 17 get a FOID card? 18 A. Not the FOID card, no. 19 Q. Did you have any sort of firearms-related 20 training before getting the FOID card? 21 A. Not before. 22 Q. All right. Now, you know Chicago has a 23 conceal carry card, correct? 24 A. I am sorry.</p>
<p style="text-align: center;">Page 21</p> <p>1 A. No. 2 Q. Have you ever been in the military? 3 A. No. 4 Q. Okay. You know, I have to ask this. 5 Have you ever been convicted of a crime? 6 A. No. 7 Q. Have you ever been arrested for a crime? 8 A. No. 9 Q. Have you ever had any medical or first-aid 10 training? 11 A. No. 12 Q. Okay. Do you have -- you know what a FOID 13 card is, right, F-O-I-D? 14 A. Yes. 15 Q. And what would you describe it as? 16 A. It is a card that the state issues that says 17 I am able to own a firearm. 18 Q. Okay. And the FOID is an acronym, correct, 19 for Firearm -- 20 A. Firearm Owner's Identification Card, I think. 21 Q. Okay. So when did you get it? When did you 22 get the FOID card? 23 A. I cannot remember. 24 Q. How long have you had it for?</p>	<p style="text-align: center;">Page 23</p> <p>1 Q. Concealed carry, you have to have a special 2 card just like the FOID card, correct? 3 A. Correct. 4 Q. Okay. Do you have a concealed carry card? 5 A. Yes. 6 Q. All right. When did you get that? 7 A. Maybe two years ago. 8 Q. So in what year? 9 A. 2020. 10 Q. Do you know what month? 11 A. I am sorry. 12 Q. Do you know what month in 2020 you obtained 13 your conceal carry card? 14 A. No, I don't remember the month. 15 Q. Okay. And now the concealed carry card that 16 you obtained, is that issued by the state or by 17 Chicago? 18 A. By the state, I believe. 19 Q. Okay. So why did you get a concealed carry 20 card? 21 A. Also because I wanted to carry a firearm for 22 self defense in public. 23 Q. Does anyone else in your household have a 24 concealed carry card?</p>

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<p style="text-align: center;">Page 24</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. Was any training required of you in order for</p> <p>3 you to obtain the concealed carry card?</p> <p>4 A. Yes.</p> <p>5 Q. What is the training?</p> <p>6 A. From what I remember, it consists of two,</p> <p>7 8-hour classes. So 16 hours total.</p> <p>8 Q. And did you complete the two, 8-hour classes?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And what did the classes consist of?</p> <p>11 A. Going over fundamentals, unloading and</p> <p>12 loading a firearm, the functions. There was an actual</p> <p>13 shooting test at the end at the range.</p> <p>14 Q. Now, did you have to have some sort of</p> <p>15 accuracy or a minimum level of accuracy in order to</p> <p>16 pass?</p> <p>17 A. There was.</p> <p>18 Q. And what was the accuracy requirement?</p> <p>19 A. I do not remember.</p> <p>20 Q. Do you remember what your score was?</p> <p>21 A. I do not remember.</p> <p>22 Q. So where did you take the class at? Yeah.</p> <p>23 The two, 8-hour classes, where did you take them at?</p> <p>24 A. I do not remember the instructor's business.</p>	<p style="text-align: center;">Page 26</p> <p>1 are just those two, 8-hour classes, correct?</p> <p>2 A. As far as professional training, yes.</p> <p>3 Q. What do you mean in terms of professional</p> <p>4 training?</p> <p>5 A. I mean, everything else is just me going to</p> <p>6 the range and using my own -- just learning things on</p> <p>7 my own.</p> <p>8 Q. What range do you commonly go to?</p> <p>9 A. I go to Midwest Guns.</p> <p>10 Q. And where is that located?</p> <p>11 A. In Lyons.</p> <p>12 Q. Lyons, Illinois?</p> <p>13 A. Yes.</p> <p>14 Q. And so is that a shooting range, or describe</p> <p>15 the place?</p> <p>16 A. It's a shooting range and gun store.</p> <p>17 Q. And do you bring your own weapon there, or do</p> <p>18 you rent weapons from there?</p> <p>19 A. You are allowed to do both. I usually --</p> <p>20 Q. What do you do?</p> <p>21 A. I usually just bring my own.</p> <p>22 Q. Now, do you get any sort of instruction while</p> <p>23 you're there?</p> <p>24 A. I mean, just the basic safety tips same as</p>
<p style="text-align: center;">Page 25</p> <p>1 It was a place I found online. I remember that.</p> <p>2 Q. Do you remember -- so you don't remember the</p> <p>3 name of the place?</p> <p>4 A. I don't remember the name of the place, no.</p> <p>5 Q. All right. Where was it located?</p> <p>6 A. I mean, I have the certificate with</p> <p>7 everything on it. It was -- I remember it was quite</p> <p>8 south. Maybe like 20 miles south. That's all I</p> <p>9 remember.</p> <p>10 Q. But you don't remember the town that it was</p> <p>11 in?</p> <p>12 A. I don't remember what town.</p> <p>13 Q. 20 miles south. So was that still in Cook</p> <p>14 County?</p> <p>15 A. I mean, Cook County is very large.</p> <p>16 Q. I know. That's why I am asking.</p> <p>17 A. I am not sure. It very well could be. I</p> <p>18 don't know.</p> <p>19 Q. Okay. Now, other than the two, 8-hour</p> <p>20 classes you were describing for your concealed carry</p> <p>21 card, have you ever had any other type of firearm</p> <p>22 training?</p> <p>23 A. No.</p> <p>24 Q. All right. So all the training you've had</p>	<p style="text-align: center;">Page 27</p> <p>1 anywhere else. No double tapping, no rifles, no cell</p> <p>2 phones.</p> <p>3 Q. So is this someone actually telling you this,</p> <p>4 or is it just like a sign on a wall?</p> <p>5 A. I mean, there is a sign on the wall. But</p> <p>6 there is also the range officer that kind of sits</p> <p>7 behind us watching everything, make sure no rules are</p> <p>8 violated.</p> <p>9 Q. All right. So other than having someone sit</p> <p>10 behind and make sure no rules are violated, do you</p> <p>11 receive any sort of advice or guidance or instruction</p> <p>12 while you're using the gun range?</p> <p>13 A. No.</p> <p>14 Q. So basically you're figuring it out for</p> <p>15 yourself how to use the weapon, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. All right. So what type of firearms</p> <p>18 do you -- well, you talked about bringing your own</p> <p>19 weapon.</p> <p>20 What weapon would you bring to Midwest Guns?</p> <p>21 A. I would bring a Glock 19.</p> <p>22 Q. Do you own any other firearms?</p> <p>23 A. No. Just that.</p> <p>24 Q. When did you buy it?</p>

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<p>1 A. Well, like pretty much right around the same 2 time I got my FOID card. Soon after.</p> <p>3 Q. So that would be six or seven years ago now?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And how much did it cost you?</p> <p>6 A. I am sorry. One more time?</p> <p>7 Q. How much did you pay for the Glock 19?</p> <p>8 A. From what I remember maybe between 5- and 9 \$600.</p> <p>10 Q. Okay. And where did you buy it?</p> <p>11 A. That same place, Midwest Guns.</p> <p>12 Q. All right. The Glock 19 is a handgun, 13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. Would it be classified as a semiautomatic, or 16 no?</p> <p>17 A. Yes.</p> <p>18 Q. It is a semi?</p> <p>19 A. I think so.</p> <p>20 Q. So what about the Glock 19 makes it 21 considered a semiautomatic?</p> <p>22 A. Pull the trigger once, it fires once.</p> <p>23 Q. That can be said of revolvers too. So what 24 is it about the Glock that makes it considered a</p>	<p>1 Q. Have you ever seen -- now, I'm not talking 2 about on TV or whatever, but have you ever seen in 3 person someone suffer from a gunshot wound?</p> <p>4 A. No. Not in person.</p> <p>5 Q. Have you ever seen someone with a gunshot 6 wound -- you said not in person.</p> <p>7 So have you ever seen someone with a gunshot 8 wound either on TV or over the computer?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And I'm not talking about a Hollywood 11 produced TV show. I mean, like a real gunshot wound?</p> <p>12 A. I've seen some police cam footage.</p> <p>13 Q. Okay. And where did you see police cam 14 footage?</p> <p>15 A. On the internet.</p> <p>16 Q. What website?</p> <p>17 A. No particular website that comes to mind. 18 Just Googling it, and it comes up.</p> <p>19 Q. So if you want to watch something like that, 20 where would you go to see it?</p> <p>21 A. I just Google. If something happens, the 22 search engine will take me to the appropriate site.</p> <p>23 Q. Well, did you make a specific effort to 24 Google this kind of footage?</p>
<p style="text-align: center;">Page 29</p> <p>1 semiautomatic?</p> <p>2 A. My understanding is just there is just 3 semiautomatic and full autos. Semiautomatic is just 4 with each pull one bullet is fired as opposed to a 5 full automatic one, you pull it once, and it keeps 6 firing.</p> <p>7 Q. I see. So what made you decide to buy that 8 Glock 19 as opposed to some other type?</p> <p>9 A. I liked the caliber. I have a preference for 10 9 millimeter because, as I understand, it's as 11 effective as say a 45, but it's more widely produced. 12 So it's cheaper, and ammo is more available.</p> <p>13 And I like the size of the weapon. It's not 14 too big, and it's not too small. So it's kind of in 15 the middle. I think makes it ideal for concealed 16 carry.</p> <p>17 Q. So what's the purpose of you having the Glock 18 19?</p> <p>19 A. Self defense.</p> <p>20 Q. All right. Have you ever had to use your 21 Glock 19 in self defense?</p> <p>22 A. No. I never had to use it. Fortunately, no.</p> <p>23 Q. Have you ever shot anyone with it?</p> <p>24 A. No.</p>	<p style="text-align: center;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. Why did you do that?</p> <p>3 A. Curiosity.</p> <p>4 Q. Why were you curious?</p> <p>5 A. It was getting a lot of media attention.</p> <p>6 Q. Let's back up.</p> <p>7 So what was the media attention you are 8 referring to that made you --</p> <p>9 MR. BERGSTROM: Objection. Relevance.</p> <p>10 BY MR. ADELMAN:</p> <p>11 Q. He can answer.</p> <p>12 A. I'm referring to the Toledo shooting.</p> <p>13 Q. Okay. And so what about it made you want to 14 Google police cam footage?</p> <p>15 A. Just --</p> <p>16 MR. BERGSTROM: Objection.</p> <p>17 THE WITNESS: As I stated, it was getting a lot of 18 attention, and I wanted to see for myself what 19 happened.</p> <p>20 BY MR. ADELMAN:</p> <p>21 Q. Okay. Now, in this police cam footage you 22 are talking about, was this footage of the Toledo 23 shooting?</p> <p>24 A. Yes.</p>

10 (Pages 28 to 31)

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<p style="text-align: center;">Page 32</p> <p>1 Q. Okay. Now, did you actually see a gunshot 2 injury when you were watching?</p> <p>3 MR. BERGSTROM: Same objection.</p> <p>4 BY MR. ADELMAN:</p> <p>5 Q. You can answer.</p> <p>6 A. I'm trying to remember, and I don't remember 7 if you actually see the wound.</p> <p>8 Q. Okay. Well, so when I ask you if you have 9 ever -- all right. Well, maybe I wasn't specific 10 enough when I asked you if you saw someone in person 11 or saw someone on some other medium with a gunshot 12 wound.</p> <p>13 Have you actually seen a gunshot wound 14 itself, whether on TV or computer? And you said not 15 in person.</p> <p>16 But on any of those mediums have you ever 17 seen an actual gunshot wound?</p> <p>18 MR. BERGSTROM: Objection. Relevance. And I'll 19 just leave that for the whole line of questioning.</p> <p>20 BY MR. ADELMAN:</p> <p>21 Q. Yeah. You can still answer.</p> <p>22 A. Yes, I have still seen them.</p> <p>23 Q. Okay. All right. Based on your testimony 24 that rules out your video of the Toledo shooting.</p>	<p style="text-align: center;">Page 34</p> <p>1 gunshot wounds?</p> <p>2 A. Right.</p> <p>3 Q. All right. Do you consider yourself 4 knowledgeable about handguns?</p> <p>5 A. I feel like I still have more to learn, but I 6 think I'm adequately knowledgeable.</p> <p>7 Q. So how have you tried to educate yourself on 8 handguns?</p> <p>9 A. Usually -- sometimes I read books, and 10 sometimes I watch YouTube videos from other people who 11 seem to be experts in that. And, of course, practice 12 as well at the range.</p> <p>13 Q. So what are the different kinds of handguns?</p> <p>14 A. What do you mean? You mean like revolvers 15 and the standard striker handguns?</p> <p>16 Q. Whatever you know. What types of handguns do 17 you know of?</p> <p>18 A. I mean, it's pretty -- I don't know what in 19 particular you want me to say. I know there is 20 revolvers. There is standard handguns of various 21 calibers. There is different manufacturers. Then I 22 listed some of those manufacturers like Smith & 23 Wesson --</p> <p>24 THE REPORTER: He keeps buffering.</p>
<p style="text-align: center;">Page 33</p> <p>1 So what footage are you referring to when you 2 said you have seen an actual bullet wound?</p> <p>3 A. I have seen sometimes videos of accidents 4 that people have had.</p> <p>5 Q. And these videos show the actual wound?</p> <p>6 A. You see them kind of grabbing and blood, and 7 sometimes you see pictures.</p> <p>8 Q. Okay. And do you remember what websites 9 you've gone to to see these?</p> <p>10 A. A lot of time they just pop up randomly. 11 Possibly I read it. I may have seen it.</p> <p>12 Q. How many of these videos or pictures have you 13 seen?</p> <p>14 A. Not too many.</p> <p>15 Q. Well, can you give me an estimate, like four, 16 five, ten, one? What would you estimate?</p> <p>17 A. That's about right.</p> <p>18 Q. Can you give me a number, four or five?</p> <p>19 A. Four or five.</p> <p>20 Q. Okay. But you said you've never seen a 21 gunshot wound in person, correct?</p> <p>22 A. Not in person, correct.</p> <p>23 Q. Okay. So would it be fair to say you don't 24 really have any experience with people who have</p>	<p style="text-align: center;">Page 35</p> <p>1 THE WITNESS: -- and SIG Sauer, Glock. 2 I stated those specific manufacturers 3 such as SIG Sauer, Smith & Wesson, and Glock.</p> <p>4 BY MR. ADELMAN:</p> <p>5 Q. Six-Hour, you said?</p> <p>6 A. SIG Sauer.</p> <p>7 Q. And Glock?</p> <p>8 A. Yeah.</p> <p>9 Q. Do you know the difference between a 10 centerfire pistol and a rimfire pistol?</p> <p>11 A. Yes.</p> <p>12 Q. What is the difference?</p> <p>13 A. I believe it refers to where the pin strikes 14 the bullet, whether it's right in the center or as 15 opposed to more towards the edge.</p> <p>16 Q. What are the advantages of having a 17 centerfire pistol over a rimfire pistol?</p> <p>18 MR. BERGSTROM: Objection. Form. You can answer.</p> <p>19 MR. ADELMAN: Well, let me rephrase it.</p> <p>20 BY MR. ADELMAN:</p> <p>21 Q. Do you know what the advantages of having a 22 centerfire pistol are?</p> <p>23 A. Specifically, typically --</p> <p>24 THE REPORTER: Counsel, I didn't get that answer.</p>

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<p>1 THE WITNESS: No.</p> <p>2 BY MR. ADELMAN:</p> <p>3 Q. Okay. When I asked you --</p> <p>4 A. No. I said no.</p> <p>5 Q. Okay. Do you know the disadvantages of <p>6 having a centerfire pistol?</p> <p>7 A. I am not aware of disadvantages.</p> <p>8 Q. Okay. Now, about the rimfire pistol, do you <p>9 know any advantages of having a rimfire pistol?</p> <p>10 MR. BERGSTROM: Objection. Relevance.</p> <p>11 BY MR. ADELMAN:</p> <p>12 Q. You can answer.</p> <p>13 A. No.</p> <p>14 Q. And do you know any disadvantages of having a <p>15 rimfire pistol?</p> <p>16 MR. BERGSTROM: Same objection.</p> <p>17 BY MR. ADELMAN:</p> <p>18 Q. You can answer.</p> <p>19 A. No.</p> <p>20 Q. In terms of firearms, round capacity, is it <p>21 fair to say that means how many bullets any particular <p>22 firearm can accommodate at one time?</p> <p>23 A. Yes.</p> <p>24 Q. Is there a difference in round capacity</p> </p></p></p></p></p>	<p>1 A. It's a weapon in which you pull the trigger <p>2 once, and it continuously fires more than one round <p>3 out of it.</p> <p>4 Q. All right. So what are the advantages of <p>5 having -- so what advantage does an automatic weapon <p>6 have over a semiautomatic weapon?</p> <p>7 MR. BERGSTROM: Objection. Form.</p> <p>8 THE WITNESS: Well, in terms of advantages, I <p>9 guess one would see the increased firepower as a <p>10 possible advantage.</p> <p>11 BY MR. ADELMAN:</p> <p>12 Q. All right. And so you had mentioned that you <p>13 used a Glock or that you purchased a Glock for self <p>14 defense.</p> <p>15 And you mentioned that an advantage of <p>16 automatic weapons would be an increase of firepower.</p> <p>17 So would an increase of firepower be an <p>18 advantage in a self defense situation?</p> <p>19 A. To an extent, but not -- I would not want <p>20 full auto for self defense, if that's what you mean.</p> <p>21 Q. Why not?</p> <p>22 A. I find full autos to be too unpredictable. <p>23 It's more recoil, hard to control. I think semi-auto <p>24 is more advantageous for self defense. You have</p> </p></p></p></p></p></p></p></p></p></p></p></p></p>
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<p>1 between a centerfire pistol and a rimfire pistol?</p> <p>2 MR. BERGSTROM: Objection. Relevance.</p> <p>3 BY MR. ADELMAN:</p> <p>4 Q. If you know.</p> <p>5 MR. BERGSTROM: When I object, Cutberto, you can <p>6 just answer afterwards.</p> <p>7 THE WITNESS: I am not aware of a difference in <p>8 terms of those two firearms.</p> <p>9 BY MR. ADELMAN:</p> <p>10 Q. Okay. And do you know whether there is any <p>11 difference between a centerfire pistol and a rimfire <p>12 pistol?</p> <p>13 Do you know if there is any difference in how <p>14 many rounds per second each one fires?</p> <p>15 A. No.</p> <p>16 Q. All right. Now, earlier you had talked about <p>17 how the Glock is the semiautomatic, the weapon, and <p>18 you had mentioned --</p> <p>19 A. Right.</p> <p>20 Q. You had mentioned automatic weapons.</p> <p>21 So you know what an automatic weapon is, <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. How would you describe an automatic weapon?</p> </p></p></p></p></p></p></p></p>	<p>1 better control of the weapon.</p> <p>2 Q. So you said semiautomatic is better to <p>3 control?</p> <p>4 A. Yes.</p> <p>5 Q. And so what's the round capacity of your <p>6 Glock?</p> <p>7 A. 15 plus 1.</p> <p>8 Q. What's the plus 1?</p> <p>9 A. The one in the chamber.</p> <p>10 Q. Okay. So does that mean you have one bullet <p>11 in the chamber and then 15 --</p> <p>12 A. That would be, yes, correct.</p> <p>13 Q. Where does the cartridge containing the 15 <p>14 rounds go?</p> <p>15 A. I'm sorry.</p> <p>16 Q. You said the cartridge with 15 rounds, where <p>17 in the Glock does that fit?</p> <p>18 A. On the handle.</p> <p>19 Q. It goes inside the handle?</p> <p>20 A. Yes. The magazine.</p> <p>21 Q. Okay. So how many rounds per second does <p>22 your Glock fire?</p> <p>23 A. Honestly, I don't shoot it that fast. So I <p>24 don't know that.</p> </p></p></p></p></p></p></p>

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<p style="text-align: center;">Page 40</p> <p>1 Q. And how many rounds per second does an 2 automatic weapon fire?</p> <p>3 A. I'm sorry.</p> <p>4 Q. Are you familiar with AR-15s?</p> <p>5 A. Yes.</p> <p>6 Q. And that's an automatic weapon, correct?</p> <p>7 A. No. It's semiautomatic.</p> <p>8 Q. And why do you call it semiautomatic?</p> <p>9 A. Because you pull the trigger once, and it 10 fires once.</p> <p>11 Q. But an AR-15 is also considered an assault 12 weapon, correct?</p> <p>13 A. Some people would label it as such.</p> <p>14 Q. And what do you label it as?</p> <p>15 A. I think assault is a matter of opinion, and 16 what you use it for. It's just a rifle, just a 17 weapon.</p> <p>18 Q. So do you consider a handgun a self defense 19 weapon?</p> <p>20 A. Yes.</p> <p>21 Q. And it's easier to store in a location that's 22 readily accessible in an emergency, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And you could store it next to your</p>	<p style="text-align: center;">Page 42</p> <p>1 easily be redirected or wrestled away by an attacker?</p> <p>2 A. Yeah.</p> <p>3 MR. BERGSTROM: Objection. Form.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. ADELMAN:</p> <p>6 Q. Okay. Now, do you believe that a handgun is 7 easier to use by those without the upper body strength 8 needed to use a long gun?</p> <p>9 MR. BERGSTROM: Objection. Form.</p> <p>10 BY MR. ADELMAN:</p> <p>11 Q. You can answer.</p> <p>12 A. It might be.</p> <p>13 Q. Okay. Well, you know what a long gun is, 14 right?</p> <p>15 A. Yes.</p> <p>16 Q. All right. How would you define it?</p> <p>17 A. Just a long -- like a rifle-like firearm. A 18 stock, long barrel.</p> <p>19 Q. Okay. And does lifting a long barrel gun 20 like that require two hands?</p> <p>21 A. I guess you could lift it with one hand, but 22 it's easier with two hands.</p> <p>23 Q. And to use it properly do you need two hands?</p> <p>24 A. Yes.</p>
<p style="text-align: center;">Page 41</p> <p>1 bed, a handgun, correct?</p> <p>2 A. Yes.</p> <p>3 Q. All right. Now, where do you store your 4 handgun, your Glock?</p> <p>5 A. If I am in the home, I keep it in a drawer.</p> <p>6 Q. The drawer, is it in a table, cabinet, desk?</p> <p>7 A. It's a cabinet.</p> <p>8 Q. Cabinet?</p> <p>9 A. Uh-huh.</p> <p>10 Q. In what room of your apartment is it in?</p> <p>11 A. My room.</p> <p>12 Q. In your bedroom?</p> <p>13 A. Yes.</p> <p>14 Q. Is it fair to say that one of the advantages 15 of using a handgun as a self defense weapon is that 16 you can use it in the house without endangering family 17 members?</p> <p>18 MR. BERGSTROM: Objection. Form.</p> <p>19 THE WITNESS: I am sorry. What was the question?</p> <p>20 BY MR. ADELMAN:</p> <p>21 Q. Is it fair to say that you can use a handgun 22 in the house without endangering family members?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And is it fair to say that it cannot</p>	<p style="text-align: center;">Page 43</p> <p>1 Q. Okay. Whereas, it's possible to aim a 2 handgun with only one hand, correct?</p> <p>3 A. Yes. Also correct, but it won't be as 4 accurate.</p> <p>5 Q. Training recommends two hands, correct?</p> <p>6 A. Yes.</p> <p>7 Q. But it's still possible to use a handgun with 8 one hand, correct?</p> <p>9 A. Yes.</p> <p>10 Q. So like if you are holding it in one hand, 11 you can use the other hand to dial the police at the 12 same time is?</p> <p>13 MR. BERGSTROM: Objection. Form.</p> <p>14 BY MR. ADELMAN:</p> <p>15 Q. Correct?</p> <p>16 A. Yes, correct.</p> <p>17 Q. Okay. Do you know other people who have 18 handguns?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. How many other people do you know that 21 have handguns?</p> <p>22 A. Four or five. About five.</p> <p>23 Q. Okay. Are these friends, relatives?</p> <p>24 A. Both.</p>

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<p>1 Q. Okay. So would you say that handguns then 2 are a popular choice for self defense? 3 MR. BERGSTROM: Objection. Form. 4 BY MR. ADELMAN: 5 Q. You can answer. 6 A. I would say, yes, here they're popular. 7 Q. Now, under what circumstances would a handgun 8 be insufficient for self defense? 9 MR. BERGSTROM: Objection. Form. 10 BY MR. ADELMAN: 11 Q. You can answer. 12 A. I believe it would be problematic if it was a 13 situation in which there were multiple attackers, and 14 perhaps they have -- they're all armed, a single 15 person with a firearm might be at a disadvantage. 16 Q. So are you afraid that there would be 17 multiple people breaking in your house at the same 18 time? 19 A. I believe so. 20 MR. BERGSTROM: Objection. Form. 21 BY MR. ADELMAN: 22 Q. Do you read any magazines dedicated to 23 firearms? 24 A. Magazines, no.</p>	<p>1 BY MR. ADELMAN: 2 Q. Can you remember any other blogs that you 3 visited? 4 A. No. I don't remember names. 5 Q. Okay. Now, is it your understanding that 6 it's common to own an assault weapon like we 7 discussed? 8 MR. BERGSTROM: Objection. Form. 9 THE WITNESS: Like what is labeled as an assault 10 weapon? 11 BY MR. ADELMAN: 12 Q. Yeah. 13 A. Like an AR-15. 14 Q. Let's use that as an example. 15 Yeah. Is it your understanding that it's 16 common to own an assault weapon like an AR-15? 17 A. I believe in America the AR-15 is a pretty 18 common weapon among various people. Obviously not 19 here because we're not allowed to. 20 Q. Okay. What do you base that opinion on? 21 A. Just things that I read online, and what I 22 see in terms of people who own firearms and fire them. 23 Them having an AR-15 is not uncommon. 24 Q. And when you say things you read online, you</p>
<p style="text-align: center;">Page 45</p> <p>1 Q. Do you visit any websites dedicated to 2 firearms? 3 A. Occasionally, yes. I will read on blog posts 4 and various things. 5 Q. Can you repeat the name of it? I didn't 6 catch it. 7 A. No name in particular. Just various blogs. 8 I said nothing in particular. It's just blog posts. 9 Q. Oh, blog posts. Okay. 10 A. Yes. 11 Q. So what blogs do you visit? 12 A. I said these are -- none in particular. They 13 are various. 14 Q. Can you think of one off the top of your 15 head? 16 A. The NRA has a blog. So that's one I 17 sometimes read on. 18 Q. What kinds of things do you read on the blog 19 post from the NRA? 20 MR. BERGSTROM: Objection. Relevance. 21 THE WITNESS: I mean, in particular, in this 22 particular situation, I was trying to read something 23 on how to correct an error in my shooting. 24</p>	<p style="text-align: center;">Page 47</p> <p>1 are referring to these blog posts that you were 2 talking about? 3 A. Various websites. 4 MR. BERGSTROM: Form. 5 BY MR. ADELMAN: 6 Q. Do you know how many assault weapons are 7 owned by people in the United States? 8 MR. BERGSTROM: Objection. Form. 9 THE WITNESS: No. 10 BY MR. ADELMAN: 11 Q. Can you make a reasonable estimate of how 12 many are owned in the United States? 13 MR. BERGSTROM: Objection. Form. 14 BY MR. ADELMAN: 15 Q. You can answer. 16 I won't hold you to an exact number, but do 17 you have like an estimate in mind when you consider 18 when you make this claim that it's common to own an 19 assault weapon? 20 MR. BERGSTROM: Objection. Form. 21 THE WITNESS: No. 22 BY MR. ADELMAN: 23 Q. All right. So you have no estimate? 24 A. For that particular firearm, no.</p>

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<p style="text-align: center;">Page 48</p> <p>1 Q. Or any -- it doesn't have to be an AR-15 in 2 particular but any similar type of firearm?</p> <p>3 MR. BERGSTROM: Same objection.</p> <p>4 THE WITNESS: No.</p> <p>5 BY MR. ADELMAN:</p> <p>6 Q. Do you think maybe it's like 5 million people 7 own firearms -- or strike that.</p> <p>8 5 million people own assault weapons similar 9 to the AR-15?</p> <p>10 MR. BERGSTROM: Objection. Form.</p> <p>11 BY MR. ADELMAN:</p> <p>12 Q. You can answer.</p> <p>13 A. I don't know the specific number.</p> <p>14 Q. So you don't know if it's 1 million, 15 5 million, 10 million, any number like that, correct?</p> <p>16 MR. BERGSTROM: Objection. Asked and answered.</p> <p>17 BY MR. ADELMAN:</p> <p>18 Q. You can answer.</p> <p>19 A. As I said, I don't know a specific number.</p> <p>20 Q. Okay. So if you don't know the number then 21 you can't state what percentage of people in the US 22 actually own assault weapons, correct?</p> <p>23 MR. BERGSTROM: Objection. Form.</p> <p>24 BY MR. ADELMAN:</p>	<p style="text-align: center;">Page 50</p> <p>1 Ms. Court Reporter, did you get that, 2 or did you need him to repeat it?</p> <p>3 THE REPORTER: The answer I have is:</p> <p>4 Well, I mean, to me it doesn't seem unusual. So 5 I wouldn't say it's uncommon.</p> <p>6 BY MR. ADELMAN:</p> <p>7 Q. What do you base that comment that it's not 8 unusual on if you don't know how many people in the US 9 own assault weapons, and you can't say what percentage 10 of people in the US do?</p> <p>11 MR. BERGSTROM: Objection. Form.</p> <p>12 BY MR. ADELMAN:</p> <p>13 Q. So what do you base your comment on?</p> <p>14 A. To me, it seems to be -- it doesn't seem 15 unusual for people in other states to own something 16 like that. Perhaps in states more down south.</p> <p>17 Q. And what do you base that on?</p> <p>18 MR. BERGSTROM: Objection. Form.</p> <p>19 BY MR. ADELMAN:</p> <p>20 Q. You can answer.</p> <p>21 A. Just other things that I read online from 22 other shooting activities that occur in other states 23 in other areas. When people go shooting, they do 24 carry weapons like that.</p>
<p style="text-align: center;">Page 49</p> <p>1 Q. You can answer.</p> <p>2 A. No, I don't know the particular percentage.</p> <p>3 Q. Okay. So if you don't know how many people 4 own an assault weapon, and you don't know what 5 percentage of the population of the United States own 6 an assault weapon, how is it that you can say that 7 it's common to own an assault weapon?</p> <p>8 MR. BERGSTROM: Objection. Form.</p> <p>9 BY MR. ADELMAN:</p> <p>10 Q. You can answer.</p> <p>11 A. I believe it's difficult to really come up 12 with a number when there is -- we're thinking that big 13 in terms of entire population, in the population how 14 many have firearms, how many have that particular 15 weapon. I believe it's much more common to try to 16 come up with what is considered common than uncommon.</p> <p>17 Q. Okay. Well, since you don't know the number, 18 then you don't know whether it's common or not, 19 correct?</p> <p>20 MR. BERGSTROM: Same objection.</p> <p>21 THE WITNESS: Well, I mean, to me it doesn't seem 22 unusual. So I wouldn't say it's uncommon.</p> <p>23 I am sorry.</p> <p>24 MR. ADELMAN: You were frozen there for a minute.</p>	<p style="text-align: center;">Page 51</p> <p>1 Q. Okay. But you haven't participated in any 2 studies regarding assault weapons or the commonality 3 of assault weapons, correct?</p> <p>4 A. No.</p> <p>5 Q. And you haven't read any studies concerning 6 assault weapons, correct?</p> <p>7 A. I might have read stuff before, but I 8 honestly can't remember the specifics.</p> <p>9 Q. So as you sit here today, you can't say with 10 any sort of reasonable degree of certainty as to how 11 common or uncommon an assault weapon actually -- 12 ownership of an assault weapon actually is?</p> <p>13 MR. BERGSTROM: Objection. Form.</p> <p>14 BY MR. ADELMAN:</p> <p>15 Q. You just don't know, correct?</p> <p>16 MR. BERGSTROM: Same objection.</p> <p>17 BY MR. ADELMAN:</p> <p>18 Q. You can answer.</p> <p>19 A. To me it seems like in other states, it is 20 something that isn't uncommon. So I can't really -- 21 it's difficult for me to say whether it's uncommon or 22 common because I don't know what people have in their 23 homes.</p> <p>24 Q. Okay. So you're familiar with the Cook</p>

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<p style="text-align: center;">Page 52</p> <p>1 County ordinance that prohibits assault weapons, correct?</p> <p>2 A. Well, you got cut off.</p> <p>3 If I am familiar with the Cook County --</p> <p>4 Q. Ordinance that prohibits assault weapons, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And is there a particular type of assault weapon that you actually want to buy?</p> <p>7 A. Yes.</p> <p>8 Q. What type is that?</p> <p>9 A. One particular type is I wanted to get an AR-15.</p> <p>10 Q. Made by who? Who is the manufacturer?</p> <p>11 A. Smith & Wesson M&P15. I am sorry.</p> <p>12 Q. No. I didn't say anything. Why is it that you want to get an AR-15?</p> <p>13 A. Also for self defense.</p> <p>14 Q. And you had said before that it would be for self defense if you were attacked by multiple people who are armed, is that the reason?</p> <p>15 A. Yes.</p> <p>16 MR. BERGSTROM: Objection. Form.</p> <p>17 BY MR. ADELMAN:</p>	<p style="text-align: center;">Page 54</p> <p>1 Q. Would you store the AR-15 loaded or unloaded?</p> <p>2 A. Loaded.</p> <p>3 Q. And where would you store the ammunition?</p> <p>4 A. That same safe.</p> <p>5 Q. The ammunition that's not actually loaded in the AR-15?</p> <p>6 A. That same safe.</p> <p>7 Q. You know what, this reminds me I forgot to ask you.</p> <p>8 You had said that you store your Glock in the cabinet drawer in your bedroom.</p> <p>9 That's correct?</p> <p>10 A. When I am here. When I am here, yes.</p> <p>11 Q. Yeah, at home. Do you store it loaded or unloaded?</p> <p>12 A. Loaded.</p> <p>13 Q. And where do you keep the ammunition to your Glock?</p> <p>14 A. I keep it in my range bag.</p> <p>15 Q. And where is your range bag when you are at home?</p> <p>16 A. In my closet.</p> <p>17 Q. So the Glock is stored loaded in the cabinet drawer, and the ammunition is in the bag in your</p>
<p style="text-align: center;">Page 53</p> <p>1 Q. Okay. Now, in your experience, are handguns more common than AR-15s?</p> <p>2 MR. BERGSTROM: Objection. Form.</p> <p>3 BY MR. ADELMAN:</p> <p>4 Q. In your experience, is it more common for people to own handguns for self defense than AR-15s?</p> <p>5 A. In Chicago, yes.</p> <p>6 Q. Okay. What about nationwide?</p> <p>7 MR. BERGSTROM: Objection. Form.</p> <p>8 THE WITNESS: They seem to be the most popular, and there is also restrictions.</p> <p>9 BY MR. ADELMAN:</p> <p>10 Q. So if you were allowed to purchase assault weapons, how many assault weapons would you purchase?</p> <p>11 A. One.</p> <p>12 Q. Where would you store it? Where would you store the AR-15 if you were allowed to purchase it?</p> <p>13 A. I would purchase a long, full-sized safe to keep that.</p> <p>14 Q. Then would you store the weapon in there?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. What room do you think you would put the full-size safe in?</p> <p>17 A. Also in my room, my bedroom.</p>	<p style="text-align: center;">Page 55</p> <p>1 closet, correct?</p> <p>2 A. Spare ammunition, yes.</p> <p>3 Q. All right. So if you were able to buy an assault weapon like an AR-15, what's your intended use for it?</p> <p>4 A. Mainly self defense. Outside of that taking it to the range to improve my skills.</p> <p>5 Q. So other than for the range, that's self-explanatory.</p> <p>6 But for self defense, do you mean for defense of the home?</p> <p>7 A. Yes.</p> <p>8 Q. Do you plan to open carry it outside?</p> <p>9 A. No.</p> <p>10 Q. So if there is another riot in the city, would you be taking your AR-15 out in public?</p> <p>11 MR. BERGSTROM: Objection. Form.</p> <p>12 THE WITNESS: I didn't hear the question.</p> <p>13 MR. ADELMAN: Let me rephrase it before you answer.</p> <p>14 BY MR. ADELMAN:</p> <p>15 Q. If you are allowed to buy an AR-15, and there is another riot in the city, is it your intent to take the AR-15 out in public at that point?</p>

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<p>1 A. No.</p> <p>2 Q. All right. So what do you know about the destructive potential of an AR-15?</p> <p>3 MR. BERGSTROM: Objection. Form.</p> <p>4 MR. ADELMAN: All right. Let me rephrase.</p> <p>5 BY MR. ADELMAN:</p> <p>6 Q. Do you know what the destructive potential of an AR-15 is?</p> <p>7 A. Nothing that sets it apart from -- no.</p> <p>8 Q. Well, you started to say, nothing that sets it apart.</p> <p>9 So finish that thought.</p> <p>10 A. I'm sorry.</p> <p>11 Q. Finish the thought. You started to say something, and then you stopped and then said no.</p> <p>12 So what was your thought?</p> <p>13 A. I was trying to differentiate it from like a 14 normal 9-millimeter bullet, and then I said no. It's 15 a bullet. It's a firearm. So it's gonna -- it does 16 have destructive potential like any other firearm.</p> <p>17 Q. Is it your belief that an AR-15's destructive 18 potential is the same as a 9-millimeter?</p> <p>19 A. No.</p> <p>20 Q. All right. So it's not the same.</p>	<p>1 Q. If you know?</p> <p>2 A. I don't know.</p> <p>3 Q. So what size of magazine would you want to buy if you were allowed to buy an AR-15?</p> <p>4 A. Sorry.</p> <p>5 Q. If you are allowed to buy an AR-15, what size magazine would you want?</p> <p>6 MR. BERGSTROM: Objection.</p> <p>7 THE WITNESS: For now, I would stick with a 8 10-round magazine.</p> <p>9 BY MR. ADELMAN:</p> <p>10 Q. So why would you want a 10-round magazine?</p> <p>11 A. I feel like it would be adequate.</p> <p>12 Q. All right. You said for now.</p> <p>13 So what do you mean for now a 10-round 14 magazine?</p> <p>15 A. I don't recall saying for now.</p> <p>16 MR. ADELMAN: Madam Court Reporter, can you read 17 back his answer.</p> <p>18 (The record was read as requested.)</p> <p>19 BY MR. ADELMAN:</p> <p>20 Q. Okay. So what did you mean by for now?</p> <p>21 A. Well, I would say that a 10-round magazine 22 would be adequate unless things change in the future</p>
<p style="text-align: center;">Page 57</p> <p>1 So how is it different?</p> <p>2 A. I would say it has a bit more destructive 3 potential.</p> <p>4 Q. The AR-15?</p> <p>5 A. Yes.</p> <p>6 Q. So the AR-15 has more destructive potential?</p> <p>7 A. It has more stopping power.</p> <p>8 Q. What does that mean?</p> <p>9 A. It has a higher capability of taking down an 10 attacker much quicker than the standard 9-millimeter.</p> <p>11 Q. And how does it do that?</p> <p>12 A. It is a bit more -- it has a bit more power.</p> <p>13 Q. So what -- specifically, what do you mean by 14 power? What gives it that power?</p> <p>15 A. The bullets have more energy. The bullets 16 are longer, and more black powder gives the bullet 17 more energy when it leaves.</p> <p>18 Q. So does that mean that the bullets go faster 19 out of an AR-15 than they do out of a 9-millimeter?</p> <p>20 A. My understanding is yes.</p> <p>21 Q. And can an AR-15 fire bullets faster -- at a 22 faster rate than a 9-millimeter handgun?</p> <p>23 MR. BERGSTROM: Objection. Form.</p> <p>24 BY MR. ADELMAN:</p>	<p style="text-align: center;">Page 59</p> <p>1 that would make me change my mind.</p> <p>2 Q. What would make you change your mind?</p> <p>3 A. Something. More instability. I don't know.</p> <p>4 It could be anything.</p> <p>5 Q. Well, so how would you define more 6 instability?</p> <p>7 A. Just more social unrest, more issues with 8 police response being more delayed. Something like 9 that would cause me concern.</p> <p>10 Q. So how would you use the AR-15 in the event 11 of more instability?</p> <p>12 A. I would just protect my home here and stay 13 inside.</p> <p>14 Q. Do you believe that an AR-15 and weapons like 15 it is deadlier than a handgun?</p> <p>16 MR. BERGSTROM: Objection. Form.</p> <p>17 BY MR. ADELMAN:</p> <p>18 Q. You can answer.</p> <p>19 A. One more time.</p> <p>20 Q. All right. Let me rephrase that.</p> <p>21 Do you believe an AR-15 is deadlier than a 22 9-millimeter handgun?</p> <p>23 A. I think it depends on circumstances.</p> <p>24 Q. What circumstances would it depend on?</p>

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<p>1 A. It would depend on who the shooter is, 2 whether they're accurate, what their intentions are, 3 what they have on it. Anything.</p> <p>4 Q. How does that impact how deadly a weapon is?</p> <p>5 A. Well, somebody --</p> <p>6 Q. No. Go ahead.</p> <p>7 A. Well, somebody who is more skilled with one 8 particular weapon could be more dangerous with that 9 particular weapon.</p> <p>10 Q. You cut out there.</p> <p>11 Again, like a person who is more skilled in?</p> <p>12 A. I would say a person who is skilled more with 13 a particular weapon could be perceived as more deadly 14 with that weapon.</p> <p>15 Q. So if someone is skilled on both -- all 16 things being equal, someone who is skilled with the 17 AR-15 and skilled with a 9-millimeter weapon, would 18 the AR-15 be deadlier?</p> <p>19 MR. BERGSTROM: Objection. Form.</p> <p>20 MR. ADELMAN: Well, let me rephrase that.</p> <p>21 BY MR. ADELMAN:</p> <p>22 Q. If a person has the same skill level with 23 both an AR-15 and a 9-millimeter weapon, would using 24 the AR-15 be deadlier than using a 9-millimeter</p>	<p>1 of it being misused.</p> <p>2 Q. Okay. And can you describe what you believe 3 responsible ownership of an AR-15 is?</p> <p>4 A. Same thing. Being very careful about storage 5 and being trained to use the firearm properly would be 6 responsible ownership.</p> <p>7 Q. And what would irresponsible behavior be for 8 an AR-15 owner?</p> <p>9 A. Irresponsible, you said?</p> <p>10 Q. Yes.</p> <p>11 A. Misusing it in any way. Using it for illegal 12 means, for example. Having it out when there is 13 children present.</p> <p>14 Q. And so would you say an AR-15 is dangerous if 15 it's in the wrong hands?</p> <p>16 MR. BERGSTROM: Objection. Form.</p> <p>17 BY MR. ADELMAN:</p> <p>18 Q. You can answer.</p> <p>19 A. All firearms are dangerous in the wrong 20 hands.</p> <p>21 Q. Okay. What are the dangers?</p> <p>22 A. Misuse.</p> <p>23 Q. Do you hunt?</p> <p>24 A. No.</p>
<p style="text-align: center;">Page 61</p> <p>1 weapon?</p> <p>2 MR. BERGSTROM: Objection. Form.</p> <p>3 THE WITNESS: Possibly.</p> <p>4 BY MR. ADELMAN:</p> <p>5 Q. You said possibly?</p> <p>6 A. Yes.</p> <p>7 Q. Do you believe an AR-15 is more dangerous 8 than a 9-millimeter weapon?</p> <p>9 MR. BERGSTROM: Objection. Form.</p> <p>10 THE WITNESS: I believe they're both firearms.</p> <p>11 They are both equally dangerous in and of itself.</p> <p>12 BY MR. ADELMAN:</p> <p>13 Q. But you said before that the bullets go 14 faster with an AR-15, correct?</p> <p>15 A. Yes.</p> <p>16 Q. An AR-15 has more power, correct?</p> <p>17 A. Right.</p> <p>18 Q. Okay. Can you describe to me what you 19 believe responsible ownership of an automatic weapon 20 would be?</p> <p>21 A. I would say just always have it locked and 22 out of the hands of children. If it's going to be 23 loaded, make sure that all the adults present in the 24 home are responsible with it, that there is no issue</p>	<p style="text-align: center;">Page 63</p> <p>1 Q. Have you ever gone hunting?</p> <p>2 A. No.</p> <p>3 Q. Okay. Going back to towards the beginning of 4 the deposition, you had mentioned that you are a 5 member of the Firearms Policy Coalition.</p> <p>6 Do you recall that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Have you had any discussions whether 9 by phone, virtually, or email with any members of the 10 Firearms Policy Coalition about this lawsuit?</p> <p>11 A. We've discussed it, yes, as it's progressed.</p> <p>12 Q. Who have you discussed it with?</p> <p>13 A. Will, Peter.</p> <p>14 MR. BERGSTROM: Objection.</p> <p>15 BY MR. ADELMAN:</p> <p>16 Q. Yeah, yeah. Not talking about any attorneys, 17 okay, because whatever you tell your attorney is 18 privileged. So I'm not asking about that.</p> <p>19 But any other members of the Firearms Policy 20 Coalition, have you had any discussions about this 21 lawsuit?</p> <p>22 A. One more, yes.</p> <p>23 Q. Who?</p> <p>24 A. Mike. I don't remember the last name.</p>

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<p>1 Q. Does he hold a leadership position with the 2 coalition? 3 A. I believe so. 4 Q. Do you know what his position is? 5 A. I said I believe so. 6 Q. Yeah. And what is his position? 7 A. He is involved in the -- I know it's the 8 legal department. I don't know what his exact title 9 is. 10 Q. Is he a lawyer or not? 11 A. I believe so. 12 Q. Okay. Then -- 13 MR. BERGSTROM: Objection to the extent it's 14 privileged. 15 MR. ADELMAN: Yeah. Then I am not going to ask 16 anything further on him. 17 BY MR. ADELMAN: 18 Q. Have you had any conversations with Brandon 19 Combs? 20 A. Brendan. One more time, what was the name? 21 Q. Brandon Combs. C-O-M-B-S. 22 A. That name does not sound familiar. 23 MR. ADELMAN: Can we take a 5-minute break? 24 MR. BERGSTROM: Sure.</p>	<p>1 A. Yes. 2 Q. And when? 3 A. I have heard of situations with mass 4 shootings. 5 Q. And so what mass shootings are you referring 6 to? 7 A. Specifically Columbine is one. 8 Q. And, actually, let's back up a little bit. 9 How would you define a mass shooting? 10 MR. BERGSTROM: Objection. Relevance. 11 MR. ADELMAN: Well, he just said mass shootings 12 are a way that -- a type of misuse that he has heard 13 of. 14 BY MR. ADELMAN: 15 Q. So how does he define a mass shooting? 16 You can answer. 17 A. I would go with what I believe to be the 18 FBI's definition which is when there is one shooter 19 and at least four more people are shot. 20 Q. Okay. And then in these mass shootings, what 21 are the common weapons that are used in the mass 22 shootings you have heard about? 23 A. I have heard of various. Sometimes they use 24 pistols.</p>
<p style="text-align: center;">Page 65</p> <p>1 (A break was taken.) 2 MR. ADELMAN: All right. Back on the record. 3 BY MR. ADELMAN: 4 Q. All right. Mr. Viramontes, you had said 5 before that you never actually shot a firearm in self 6 defense, correct? 7 A. Correct. 8 Q. Have you ever pulled or brandished a firearm 9 in self defense? 10 A. No. 11 Q. Were you ever present in a situation where 12 someone else did that? 13 A. No. 14 Q. Okay. All right. Let's take a look at the 15 complaint, Exhibit No. 1. 16 Do you have that before you? 17 A. Give me -- 18 MR. ADELMAN: Ms. Court Reporter, can you bring it 19 so it shows paragraph No. 3. 20 Actually, you know, I am changing my 21 mind. You can take that down. 22 BY MR. ADELMAN: 23 Q. Now, have you ever heard of an AR-15 type of 24 weapon ever being misused?</p>	<p style="text-align: center;">Page 67</p> <p>1 Q. Okay. Let's go to Columbine since you 2 mentioned that. 3 What kind of weapon did the shooter at the 4 Columbine shooting use? 5 MR. BERGSTROM: Objection. Form. 6 THE WITNESS: That I am aware of, I believe he 7 had -- 8 BY MR. ADELMAN: 9 Q. I am sorry. Can you repeat that? 10 A. I believe they had a various assortment of 11 weapons and firearms. 12 Q. So would that include AR-15s? 13 MR. BERGSTROM: Objection. Form. 14 THE WITNESS: I do not recall what specific type 15 of rifles they had. 16 BY MR. ADELMAN: 17 Q. Do you think an AR-15 was included among the 18 types of weapons that he had? 19 MR. BERGSTROM: Objection. Form. 20 THE WITNESS: I'm sorry. 21 BY MR. ADELMAN: 22 Q. Do you think an AR-15 is among the various 23 assortment of rifles you said that he had? 24 A. I'm not sure.</p>

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<p style="text-align: center;">Page 68</p> <p>1 Q. What other mass shootings are you aware of? 2 MR. BERGSTROM: Objection. Relevance. 3 BY MR. ADELMAN: 4 Q. Let's back up a little bit. 5 Columbine, where was that located, that mass 6 shooting? 7 A. Pardon. 8 Q. The Columbine shooting, what state was that 9 in? 10 A. Colorado. 11 Q. All right. And you said that you've, you 12 know, in terms of a weapon -- a weapon being misused 13 were mass shootings. 14 So what other mass shootings besides 15 Columbine are you referring to? 16 A. There was another one where a student had two 17 handguns and shot various people. I do not remember 18 the name of that school in particular. 19 Q. Can you think of anything else? 20 A. There was that one incident at the concert, I 21 believe. 22 Q. Are you talking about the one in Las Vegas? 23 A. I believe it was Las Vegas, actually. I'm 24 not sure.</p>	<p style="text-align: center;">Page 70</p> <p>1 Q. You can answer. 2 A. I know it wasn't a handgun, but I am not for 3 sure what gun in particular he had. Some sort of long 4 rifle. 5 Q. Okay. Isn't it true that it was an AR-15? 6 MR. BERGSTROM: Objection. Form. 7 MR. ADELMAN: Sorry. I took a breath. I wasn't 8 done. 9 MR. BERGSTROM: Sorry. 10 BY MR. ADELMAN: 11 Q. Isn't it true that the shooter used an 12 AR-15-type rifle with a bumper side modification? 13 MR. BERGSTROM: Objection. Form. 14 THE WITNESS: I do not recall if he had a bumper 15 stock on there. 16 BY MR. ADELMAN: 17 Q. Okay. But it was an AR-15 type of rifle? 18 MR. BERGSTROM: Objection. Form. 19 BY MR. ADELMAN: 20 Q. Correct? 21 A. I'm not sure. 22 Q. Okay. But either way it certainly was not a 23 handgun, correct? 24 MR. BERGSTROM: Objection. Form.</p>
<p style="text-align: center;">Page 69</p> <p>1 Q. Are you familiar -- let's see. Well, do you 2 recall that there was a mass shooting at a country 3 music concert in Las Vegas within the last few years? 4 MR. BERGSTROM: Objection. Relevance, form. 5 THE WITNESS: It sounds familiar. 6 BY MR. ADELMAN: 7 Q. Well, do you recall hearing about it? 8 A. If it's what I think it is, I do remember 9 something like that. 10 Q. All right. Well, what do you think it is? 11 MR. BERGSTROM: Same objection. 12 THE WITNESS: I do remember an incident where 13 somebody fired from a hotel, I believe. 14 BY MR. ADELMAN: 15 Q. Okay. What kinds of weapons do you recall 16 that the person used? 17 MR. BERGSTROM: Objection. Form. 18 THE WITNESS: I do not know what particular model 19 weapons he had. 20 BY MR. ADELMAN: 21 Q. Well, the category? What kind of category? 22 It wasn't a handgun, correct? 23 MR. BERGSTROM: Same objection. 24 BY MR. ADELMAN:</p>	<p style="text-align: center;">Page 71</p> <p>1 THE WITNESS: Correct. 2 BY MR. ADELMAN: 3 Q. That was correct? 4 A. Yes. 5 Q. Okay. Do you have any knowledge generally 6 about the fatality rate of shooting when an AR-15 is 7 used as opposed to a non -- as opposed to handgun? 8 MR. BERGSTROM: Objection. Relevance, form. 9 THE WITNESS: No. I don't know specific numbers. 10 BY MR. ADELMAN: 11 Q. What about generally? 12 MR. BERGSTROM: Same objection. 13 THE WITNESS: I can't say generally. 14 BY MR. ADELMAN: 15 Q. What is your understanding of how shootings 16 differ when an automatic -- when an assault weapon -- 17 sorry. Let me start over. 18 What is your understanding of how shootings 19 differ when an assault weapon is used versus a 20 non-assault weapon? 21 MR. BERGSTROM: Same objection. 22 THE WITNESS: I believe it's still a shooting. 23 BY MR. ADELMAN: 24 Q. And how do those shootings differ based on</p>

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<p>1 your understanding?</p> <p>2 MR. BERGSTROM: Same objection.</p> <p>3 THE WITNESS: I didn't hear.</p> <p>4 BY MR. ADELMAN:</p> <p>5 Q. What is your understanding of how those 6 different types of shootings differ -- how a shooting 7 differs when an assault weapon is used versus a 8 non-assault weapon?</p> <p>9 MR. BERGSTROM: Same objection.</p> <p>10 THE WITNESS: I can't say how in particular they 11 differ.</p> <p>12 BY MR. ADELMAN:</p> <p>13 Q. Do you think increased firepower of an 14 assault weapon, isn't it true that there would be more 15 casualties in a shooting that is done by an assault 16 weapon as opposed to a non-assault weapon?</p> <p>17 MR. BERGSTROM: Objection. Form. Relevance.</p> <p>18 BY MR. ADELMAN:</p> <p>19 Q. You can answer.</p> <p>20 A. I think it depends.</p> <p>21 Q. And depends on what?</p> <p>22 MR. BERGSTROM: Objection. Form.</p> <p>23 THE WITNESS: It depends on the assault weapon or 24 what is labeled as an assault weapon.</p>	<p>1 A. Yes.</p> <p>2 Q. They're allowed in Colorado where the 3 Columbine shooting happened, correct?</p> <p>4 A. I don't know how it is there now.</p> <p>5 Q. Well, back when the Columbine shooting 6 happened, do you know whether or not assault weapons 7 like the AR-15 were allowed in Colorado?</p> <p>8 A. No, I do not know if they owned those legally 9 or not.</p> <p>10 Q. Well, that's not my question as to whether 11 they owned it legally because it is possible to not 12 own something legally even though the category is 13 allowed.</p> <p>14 A. Yes.</p> <p>15 Q. So I am asking about whether the State of 16 Colorado at the time of the Columbine shooting to your 17 knowledge allowed AR-15s and similar assault weapons?</p> <p>18 A. I am unsure of their legal status at that 19 time.</p> <p>20 Q. Okay. So have you been personally impacted 21 by a mass shooting?</p> <p>22 A. No.</p> <p>23 Q. Have you been impacted from watching a mass 24 shooting on TV?</p>
<p style="text-align: center;">Page 73</p> <p>1 BY MR. ADELMAN:</p> <p>2 Q. Well, we have been talking about AR-15s and 3 similar models.</p> <p>4 So using that as a definition, wouldn't that 5 be correct?</p> <p>6 A. Well, it depends because AR-15s have various 7 calibers as well.</p> <p>8 Q. Okay. Well, explain that to me.</p> <p>9 A. I mean, it could be a 2-2-3. It could be a 10 5-5-6. It could even be -- there are some AR-15s that 11 are like a long rifle.</p> <p>12 A lot of people would say that is an inferior 13 round than like the standard 9-millimeter.</p> <p>14 Q. Now, assault weapons like the AR-15 are not 15 allowed in Illinois, correct?</p> <p>16 A. One more time.</p> <p>17 Q. Assault weapons like the AR-15 are not 18 allowed in Illinois, correct?</p> <p>19 A. In Cook County.</p> <p>20 Q. All right. They are not allowed in Cook 21 County, correct?</p> <p>22 A. Yes.</p> <p>23 Q. But they are allowed in other states, 24 correct?</p>	<p style="text-align: center;">Page 75</p> <p>1 A. I mean, I feel terrible for the event that 2 occurs. Sympathy.</p> <p>3 Q. So do you have any other emotional reaction 4 to hearing about mass shooting events on television or 5 on the internet?</p> <p>6 A. Mostly just sympathy for those affected.</p> <p>7 Q. Do you have any concern that a mass shooting 8 may occur at a public event you are attending?</p> <p>9 A. Like in general?</p> <p>10 Q. Yeah.</p> <p>11 A. It's always possible.</p> <p>12 Q. Do you have any actual concern that it may 13 happen?</p> <p>14 A. Yes.</p> <p>15 Q. Do you feel relatively safe?</p> <p>16 A. I always have some concern.</p> <p>17 Q. But not an overwhelming concern?</p> <p>18 A. Not overwhelming, correct.</p> <p>19 Q. Okay. And the same for when you are in a 20 public place?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Even if it's not a public event, it's the 23 same for being out in public. You don't have any 24 overwhelming concern about a mass shooting here in</p>

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<p>1 Cook County, correct?</p> <p>2 MR. BERGSTROM: Objection. Form.</p> <p>3 THE WITNESS: I feel it's still possible here in</p> <p>4 Cook County.</p> <p>5 BY MR. ADELMAN:</p> <p>6 Q. But it's not an overwhelming concern, correct?</p> <p>7 A. It's not an overwhelming concern.</p> <p>8 Q. Do you have any kids?</p> <p>9 A. No.</p> <p>10 Q. Do you have any relatives who are in school at the moment?</p> <p>11 A. No.</p> <p>12 MR. ADELMAN: All right. I may be done. Just</p> <p>13 give me a couple minutes to review off the record.</p> <p>14 (A break was taken.)</p> <p>15 MR. ADELMAN: Back on the record.</p> <p>16 BY MR. ADELMAN:</p> <p>17 Q. Okay. Mr. Viramontes, you had said that you had been a realtor for a little while --</p> <p>18 A. Yes.</p> <p>19 Q. -- correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Do you currently have an active</p>	<p>1 THE REPORTER: Format?</p> <p>2 MR. BERGSTROM: PDF.</p> <p>3 ****</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

4

5 VIRAMONTES vs. COUNTY OF COOK
6 1:21-CV-04595

7

I hereby certify that I have read the
foregoing transcript of my deposition given on
Wednesday, February 9, 2022, consisting of pages 1
through 80 inclusive, and I do again subscribe and
make oath that the same is a true, correct, and
complete transcript of my deposition so given as
aforesaid as it now appears.

14

15 Please check one:

16 ____ I have no corrections.

17 ____ Number of errata sheets
18 ____ enclosed.

19

20 _____
21 CUTBERTO VIRAMONTES

22 SUBSCRIBED AND SWORN TO
23 before me this _____.
24 day of _____ 20___.
25

26 _____
27 Notary Public

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1 STATE OF ILLINOIS)
2 COUNTY OF COOK) SS.
3

4 I, Sally A. Durkin, Illinois CSR, and Notary
5 Public, do hereby certify that on Wednesday, February
6 9, 2022, at the hour of 9:30 o'clock a.m. appeared
7 before me via Zoom videoconference from Chicago,
Illinois, CUTBERTO VIRAMONTES, in a certain cause now
pending and undetermined in the Circuit Court of Cook
County, County Department, Law Division.

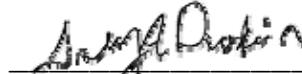
8 I further certify that the said witness was
9 first duly sworn to testify to the truth, the whole
truth, and nothing but the truth in the cause
aforesaid; that the testimony then given by said
10 witness was reported stenographically by me in the
presence of the said witness, and afterwards was
11 transcribed via computer-aided transcription, and the
foregoing is a true and correct transcript of the
testimony so given by said witness.

12 I further certify that I am not counsel for
13 nor in any way related to any of the parties to this
suit nor am I in any way interested in the outcome
thereof.

14 IN TESTIMONY WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal on February 25,
2022.

16

17



18 Sally A. Durkin, CSR
19 State of Illinois
20 CSR License No. 003144
21 161 North Clark Street
22 Suite 3050
23 Chicago, Illinois 60601
24 (312) 361-8851



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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

5 VIRAMONTES vs. COUNTY OF COOK
6 1:21-CV-04595

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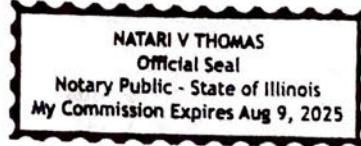
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53 11Change: where there are less restrictionsReason: Incorrect verbiage66 19Change: and at least four or more people are shotReason: missing words73 11Change: are like a 22 long rifleReason: missing word/number

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